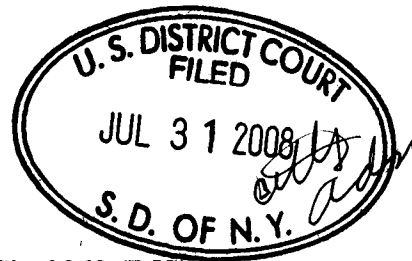


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



----- X  
INNA GUDAVADZE, LIANA ZHMOTOVA  
AND IYA PATARKATSISHVILI,

08-Civ-3363 (RJS)

Plaintiffs,

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

vs.

JOSEPH KAY (A/K/A JOSEPH  
KAKALASHVILI, A/K/A JOSEPH KEJ, A/K/A  
IOSEB KAKALASHVILI, A/K/A IOSEB  
KAKIASHVILI) AND EMANUEL ZELTSER,

Defendants.  
----- X

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District  
Courts for the Southern and Eastern Districts of New York, I, Scott M. Himes, a member in good  
standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice*  
of

Price O. Gielen  
Neuberger, Quinn, Gielen, Rubin & Gibber, P.A.  
One South Street, 27th Floor  
Baltimore, Maryland 21202  
Tel: (410) 332-8550  
Fax: (410) 332-8561  
Email: pog@nqgrg.com

and

Nathan D. Adler  
Neuberger, Quinn, Gielen, Rubin & Gibber, P.A.  
One South Street, 27th Floor  
Baltimore, Maryland 21202  
Tel: (410) 332-8550  
Fax: (410) 332-8517  
Email: nda@nqgrg.com

JUL 31 2008

90-658780

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
INNA GUDAVADZE, LIANA ZHMOTOVA  
AND IYA PATARKATSISHVILI,

Plaintiffs,

vs.

JOSEPH KAY (A/K/A JOSEPH  
KAKALASHVILI, A/K/A JOSEPH KEJ, A/K/A  
IOSEB KAKALASHVILI, A/K/A IOSEB  
KAKIASHVILI) AND EMANUEL ZELTSER,

Defendants.  
----- X

08-Civ-3363 (RJS)

**AFFIDAVIT OF SCOTT M. HIMES  
IN SUPPORT OF MOTION TO  
ADMIT COUNSEL *PRO HAC VICE***

STATE OF NEW YORK     )  
                                  )ss:  
COUNTY OF NEW YORK    )

SCOTT M. HIMES, being duly sworn, hereby deposes and says as follows:

1. I am a member of Stillman, Friedman & Shechtman, P.C., counsel for Defendant Joseph Kay in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Price O. Gielen and Nathan D. Adler as counsel *pro hac vice* to represent Defendant Joseph Kay in this matter.

2. I am a member in good standing of the Bar of the State of New York and was admitted to practice law in 1979. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing in this Court.

3. I have known Price O. Gielen since approximately early 2006. I have known Nathan D. Adler since approximately April 2008.

4. Messrs. Gielen and Adler are members of the law firm Neuberger, Quinn, Gielen, Rubin & Gibber, P.A., One South Street, 27th Floor, Baltimore, Maryland 21202.

5. I have found Messrs. Gielen and Adler to be skilled attorneys and persons of integrity. They are experienced in federal practice and are familiar with the Federal Rules of Procedure. I attach certificates of good standing for Mr. Gielen as Exhibit A and for Mr. Adler as Exhibit B.

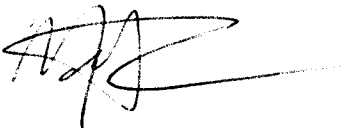
6. Accordingly, I am pleased to move the admission of Price O. Gielen and Nathan D. Adler, *pro hac vice*.

7. I respectfully submit the proposed order granting admission of Price O. Gielen and Nathan D. Adler, *pro hac vice*, which is attached hereto as Exhibit C.

WHEREFORE it is respectfully requested that the motion to admit Price O. Gielen and Nathan D. Adler, *pro hac vice*, to represent Defendant Joseph Kay in the above-captioned matter, be granted.

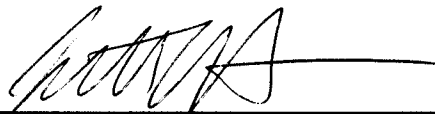
Dated: New York, New York  
July 31, 2008

Notarized:



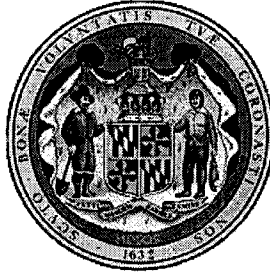
**MARIANNE ANGELICA REYES**  
Notary Public, State of New York  
No. 01RE6177271  
Qualified in New York County  
Commission Expires November 13, 2011

Respectfully submitted,



Scott M. Himes (SH-7712)

**Court of Appeals  
of Maryland  
Annapolis, MD**



***CERTIFICATE OF GOOD STANDING***

*STATE OF MARYLAND, ss:*

*I, Bessie M. Decker, Clerk of the Court of Appeals of Maryland,  
do hereby certify that on the twenty-ninth day of December, 1976,*

**Price Owen Gielen**

*having first taken and subscribed the oath prescribed by the Constitution and  
Laws of this State, was admitted as an attorney of said Court, is now in good  
standing, and as such is entitled to practice law in any of the Courts of said  
State, subject to the Rules of Court.*

**In Testimony Whereof,** *I have hereunto  
set my hand as Clerk, and affixed the Seal  
of the Court of Appeals of Maryland, this  
seventeenth day of July, 2008.*

*Bessie M. Decker*

*Clerk of the Court of Appeals of Maryland*



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

PRICE O. GIELEN

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was on the 21<sup>ST</sup> day of OCTOBER, 1977

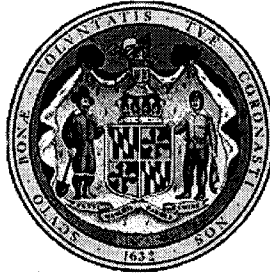
duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on July 29, 2008.

GARLAND PINKSTON, JR., CLERK

By: M. Charles  
Deputy Clerk

**Court of Appeals  
of Maryland  
Annapolis, MD**



***CERTIFICATE OF GOOD STANDING***

*STATE OF MARYLAND, ss:*

*I, Bessie M. Decker, Clerk of the Court of Appeals of Maryland,  
do hereby certify that on the fifteenth day of December, 1992,*

**Nathan Daniel Adler**

*having first taken and subscribed the oath prescribed by the Constitution and  
Laws of this State, was admitted as an attorney of said Court, is now in good  
standing, and as such is entitled to practice law in any of the Courts of said  
State, subject to the Rules of Court.*

*In Testimony Whereof, I have hereunto  
set my hand as Clerk, and affixed the Seal  
of the Court of Appeals of Maryland, this  
tenth day of July, 2008.*

*Bessie M. Decker*

*Clerk of the Court of Appeals of Maryland*

**CERTIFICATE OF SERVICE**



I, Scott M. Himes, do hereby certify that on this date, I caused true and correct copies of the foregoing Defendant's Motion to Admit Counsel *Pro Hac Vice* and Affidavit of Scott M. Himes in Support of Motion to Admit Counsel *Pro Hac Vice*, with accompanying exhibits, to be served by hand upon the following:

Christopher K. Tahbaz, Esq.  
Jennifer R. Cowan, Esq.  
Debevoise & Plimpton LLP  
919 Third Avenue  
New York, NY 10022

Edward J.M. Little, Esq.  
Hughes Hubbard & Reed LLP  
One Battery Park Plaza  
New York, NY 10004-1482

DATED: July 31, 2008



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Scott M. Himes


**CERTIFICATE OF SERVICE**

I, Scott M. Himes, do hereby certify that on this date, I caused true and correct copies of the foregoing Defendant's Motion to Admit Counsel *Pro Hac Vice* and Affidavit of Scott M. Himes in Support of Motion to Admit Counsel *Pro Hac Vice*, with accompanying exhibits, to be served by hand upon the following:

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Edward J.M. Little, Esq.  
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One Battery Park Plaza  
New York, NY 10004-1482

DATED: July 31, 2008

  
\_\_\_\_\_  
Scott M. Himes